

BAKER DECLARATION
EXHIBIT AO

RYAN KIMBLE; May 22, 2019

1

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

STATE OF WASHINGTON)
)
Plaintiff,)
)
vs.) No. 3:17-CV-05806-RJB
)
THE GEO GROUP INC.)
)
Defendant.)

DEPOSITION UPON ORAL EXAMINATION
OF RYAN KIMBLE

10:09 A.M.

MAY 22, 2019

800 FIFTH AVENUE

SUITE 2000

SEATTLE, WASHINGTON 98104



REPORTED BY: CATHERINE A. DECKER, CCR NO. 1975



A P P E A R A N C E S

FOR THE PLAINTIFF:

LAROND BAKER

ANDREA BRENNEKE

Office of the Attorney General

800 Fifth Avenue, Suite 2000

Seattle, Washington 98104

larondb@atg.wa.gov

andreab3@atg.wa.gov

206 442-4492

FOR THE DEFENDANT:

SHANNON ARMSTRONG

J. MATTHEW DONAHUE

Holland & Knight LLP

111 Southwest Fifth Avenue, Suite 2300

Portland, Oregon 97204-3626

503 517-2924

shannon.armstrong@hklaw.com

matt.donohue@hklaw.com

Also present: JUDY ST. JOHN, Paralegal for Ms. Baker



1 floors?

2 A. In the detainee area, the secured side of the
3 facility.

4 Q. So in their living units?

5 A. Their living units, hallways.

6 Q. Kitchen? Would they buff the floors in the
7 kitchen?

8 A. No.

9 Q. Would they buff the floors in the attorney
10 meeting room area?

11 A. No.

12 Q. Would they buff the floors in the medical
13 area?

14 A. Yes.

15 Q. How often does this work happen?

16 A. To my knowledge when needed.

17 Q. Can you tell me how detainee workers are
18 compensated for work in the voluntary work program, the
19 actual mechanism for paying detainee workers?

20 MS. ARMSTRONG: Object to the form.

21 A. They sign a worksheet that says that they were
22 part of the voluntary work program for that day and
23 that gets tabulated and sent as part of the bill to the
24 client.

25 Q. When you say a worksheet, can you tell me what



1 you mean by that?

2 A. It's a sheet where they have their name, their
3 A number, and they sign that they worked that day.

4 [Exhibit No. 175 was marked for identification.]

5 Q. You've been handed a document that's been
6 marked as Exhibit 175. Take a moment to familiarize
7 yourself with the document. Can you tell me what this
8 is?

9 A. The first sheet is the manual entry of
10 everybody that participated in the voluntary work
11 program for NWDC, and the sheets after that are the
12 sheets that show that they were part of the voluntary
13 work program for that day. This is January 1. There
14 is some 2017, the sheets that are behind here.

15 Q. I'm sorry. You said "manual entry." Can you
16 tell me what that means?

17 A. The finance department will get the sheets and
18 they manually put it into the key banking system to
19 apply the dollar that is associated with when they
20 signed that they participated in the voluntary work
21 program.

22 Q. What is the key banking system?

23 A. It is the banking system that Northwest
24 Detention uses to delineate detainee accounts.

25 Q. Okay. And when is the dollar credited to a



1 detainee's account?

2 MS. ARMSTRONG: Object to the form.

3 A. We're usually a day behind. We get the
4 information and they will enter that information the
5 next day.

6 Q. Okay. Are you aware of any instances where
7 detainee workers have received more than a dollar a day
8 for their participation in the voluntary work program?

9 A. Yes.

10 Q. Can you tell me about that?

11 A. It was the previous barbers that we were
12 talking about.

13 Q. And those detainee workers, how much do they
14 receive for their participation in the voluntary work
15 program?

16 A. They would receive a dollar if they were out
17 for the barber shop. And then if they were out in
18 another job if they had the other job on a different
19 day or whatever, they would be paid the dollar for that
20 day.

21 Q. Other than the barbers, have you approved
22 payment for more than one dollar a day for
23 participation in the voluntary work program?

24 MS. ARMSTRONG: Object to the form.

25 A. I think the barbers are the only one that's



1 coming to mind, yes, ma'am.

2 Q. Okay.

3 [Exhibit Nos. 176 through 178 were marked for
4 identification.]

5 Q. You've been handed three exhibits -- nos. 176,
6 177 and 178. Can you take a moment to look at these
7 and familiarize yourself with them.

8 A. Yes, ma'am.

9 Q. What are these documents?

10 A. These are the supporting documents for the
11 voluntary work program that is sent up to the COR with
12 the invoice each month.

13 Q. To the COR?

14 A. The contracting officer representative.

15 Q. Great. So if we look at Exhibit 177. There
16 are negative -- there are voids. Can you tell me what
17 those mean.

18 A. It was a miss-key when they were putting them
19 in, because we put these in manually. So if they would
20 have put a zero dollar amount then they have to void it
21 out and put it in the dollar that's there or if they
22 inadvertently doubled it, put the same number in twice,
23 that would be the voids.

24 Q. Okay. If we look at Exhibit 178, are there
25 any other reasons why a detainee's account would have



1 an void on it or would have a negative?

2 MS. ARMSTRONG: Object to the form.

3 A. No.

4 Q. Okay. So each of the entries on 178, which is
5 a reduction of a detainee worker's account of \$2, those
6 are miss keys; is that correct?

7 MS. ARMSTRONG: Object to the form.

8 A. Yes, ma'am.

9 Q. Have you ever performed any research or
10 budgeting projections involving paying detainees more
11 than a dollar a day for any work that's currently
12 performed by detainee workers in the voluntary work
13 program?

14 A. I have not.

15 Q. Are you aware of any research or budgeting
16 projections that GEO has generated regarding paying
17 more than a dollar a day for work that's performed in
18 the voluntary work program?

19 A. Not that I know of from the NWDC.

20 Q. Are you aware that of researcher budgeting
21 proposals from another location?

22 A. No.

23 Q. Okay. You referred to monthly invoices a few
24 different times. Can you tell me what the monthly
25 invoices are?



REPORTER'S CERTIFICATE

I, CATHERINE A. DECKER, the undersigned Certified Court Reporter, pursuant to RCW 5.28.010 authorized to administer oaths and affirmations in and for the state of Washington, do hereby certify that the sworn testimony and/or proceedings, a transcript of which is attached, was given before me at the time and place stated therein; that any and/or all witness(es) were by me duly sworn to tell the truth; that the sworn testimony and/or proceedings were by me stenographically recorded and transcribed under my supervision, to the best of my ability; that the foregoing transcript contains a full, true, and accurate record of all the sworn testimony and/or proceedings given and occurring at the time and place stated in the transcript; that a review of which was requested; that I am in no way related to any party to the matter, nor to any counsel, nor do I have any financial interest in the event of the cause.

WITNESS MY HAND this 4th day of June 2019.



CATHERINE A. DECKER,
Washington State Certified Court Reporter, #1975
cdecker@yomreporting.com

